

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Juarvez Reemos Juan Whitfield-Neeley, male black,
dob 4/20/1998,

Case No. 2:20-mj-425

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 15, 2020 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

18 USC 1951
18 USC 924(c)(1)(A)(iii)

Offense Description

Interference of Interstate Commerce by Robbery
Carrying, Brandishing, and Discharging a Firearm During and in Relation to
the Commission of a Crime of Violence

This criminal complaint is based on these facts:

See attached

☒ Continued on the attached sheet.

ATF TFO Brian V. Boesch

Complainant's signature

ATF TFO Brian V. Boesch

Printed name and title

Sworn to before me and signed in my presence.

Date: June 16, 2020

City and state: Columbus, OH

Kimberly A. Johnson
Kimberly A. Johnson
United States Magistrate Judge



I, Brian V. Boesch, a Task Force Officer with the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives, hereinafter the affiant, being duly sworn, states:

1. On March 15, 2020, Columbus Division of Police (CPD) officers responded to an armed robbery and shooting that occurred at the Berkeley and Main Market located at 1615 E. Main St., Columbus, OH. The patrol officers arrived and secured the scene before contacting Robbery Detective Brett Laird.
2. Detective Brett Laird responded to the scene with Detective Brett Johnson and conducted interviews of the victim clerk, Amad Al-Madan at the hospital, and witness, Helen Tyler at the scene. From those interviews and a review of the market's surveillance video, the detectives were able to determine what occurred during the robbery.
3. Ms. Tyler stated a male, later identified as Juarvez Reemos Juan WHITFIELD-NEELEY, approached her outside the market and asked her to purchase a cigar for him. She agreed and they entered the market together. Ms. Tyler obtained the cigar, but was unable to pay at that time. She handed the cigar to WHITFIELD-NEELEY. After a brief discussion, Ms. Tyler and WHITFIELD-NEELEY were asked to leave the store and turned and began walking to the exit.
4. However, WHITFIELD-NEELEY turned back around and produced a handgun from his pocket and pointed it at Mr. Al-Madan while demanding cash from the register. He then directed Mr. Al-Madan behind the register as he was pointing the handgun at him.
5. As Mr. Al-Madan complied he walked behind the counter towards the register when WHITFIELD-NEELEY pointed the handgun at Mr. Al-Madan's left leg and shot him. The bullet struck just above his left knee and exited into the floor of the market. Mr. Al-Madan began to struggle with WHITFIELD-NEELEY over the handgun. However, during the brief struggle, Mr. Al-Madan's personal handgun fell out of his waistband and onto the floor of the market. WHITFIELD-NEELEY picked up Al-Madan's handgun and fled the market. The stolen handgun is a Taurus model G2C, 9mm pistol, serial number TMC10171.
6. On April 1st, 2020, the Toledo Police Department filed State of Ohio arrest warrants for WHITFIELD-NEELEY for Aggravated Robbery. This warrant stems from an armed business robbery in Toledo where two (2) clerks were shot by the robbery suspects. Surveillance video was released to the public that assisted in identifying WHITFIELD-NEELEY.
7. Members of the United States Marshals Service (USMS) Southern Ohio Fugitive Apprehension Strike Team (SOFASST) were made aware of the warrant and that their counterparts from the Northern District of Ohio had identified an address in Columbus that WHITFIELD-NEELEY may be staying. On April 23, 2020, SOFAST members located WHITFIELD-NEELEY at 225 Morrison Ave. in Columbus and arrested him for the

warrant.

8. SOFAST members obtained a consent to search the residence from the homeowner, Dejanee Dunlap. Inside the residence, SOFAST located a loaded Taurus G2C pistol, serial number TMC10171. This is the stolen handgun taken from Mr. Al-Madan. Ms. Dunlap disavowed any possession or knowledge of the handgun.
9. On May 16, 2020, CPD Detective Laird created a photo array containing a photograph of WHITFIELD-NEELEY. His photo was randomly placed with five (5) other photos of persons with similar facial characteristics by the CPD mugshots computer application. The computer application randomly placed his photo in the number five (5) position in the array. That same day, Detective Johnson acted as a blind administrator for the photo array and presented the array to Mr. Al-Madan. Mr. Al-Madan immediately selected the photo of WHITFIELD-NEELEY as the person that robbed and shot him. Detective Johnson noted, "Mr. Al-Madan chose #5 and stated that he can not forget his face."
10. The Berkeley and Main Market is located on the near east side of Columbus, OH and provides household items, limited food and snack items, beer and wine and cigarettes for sale. The wine is produced in states such as California and Oregon and shipped across state lines by food and beverage distributors. The cigarettes include such brands as Marlboro, Newport's, and Camel. The cigarettes are produced in Virginia and North Carolina and shipped across the country. The market is therefore engaged in interstate commerce.
11. This incident occurred in the City of Columbus, Franklin County, located in the Southern District of Ohio.

ATF TFO Brian V. Boesch

Signature of Complainant
Task Force Officer Brian V. Boesch

Sworn to before me and subscribed in my presence,

June 16, 2020

_____, 2020, at Columbus, OH

Kimberly A. Johnson
Kimberly A. Johnson
United States Magistrate Judge

